

1 David N. Lake, Esq., State Bar No. 180775
2 **LAW OFFICES OF DAVID N. LAKE**
3 **A Professional Corporation**
4 16130 Ventura Boulevard, Suite 650
5 Encino, California 91436
6 Telephone: (818) 788-5100
7 Facsimile: (818) 788-5199
8 david@lakelawpc.com

9 Attorneys for Plaintiffs

10
11 **UNITED STATES DISTRICT COURT**
12 **CENTRAL DISTRICT OF CALIFORNIA**

13 ADVANCED ADVISORS, G.P., *et al.*,

14 Plaintiffs,

15 v.

16 STEPHEN BERMAN, an individual;
17 MICHAEL G. MILLER, an individual;
18 MURRAY L. SKALA, an individual;
19 ROBERT E. GLICK, an individual;
20 MARVIN ELLIN, an individual; and
21 DAN ALMAGOR, an individual;

22 Defendants.

23 JAKKS PACIFIC, INC.,

24 Nominal Defendant.

Case No. 2:14-01420-JAK (SSx)

[CONSOLIDATED]

25 **PLAINTIFFS' REQUEST FOR**
26 **CLARIFICATION OF JUNE 12,**
27 **2015 ORDER**

1 Plaintiffs respectfully request clarification of the Court's June 12, 2015 Order
2 (Dkt. 103). Specifically, the Court has requested that Plaintiffs' counsel provide
3 additional evidentiary support concerning the request for an award of attorneys' fees
4 in the form of declarations from counsel providing specific information about the
5 tasks performed. Plaintiffs' counsel will provide the Court with this evidence.

6 Plaintiffs' counsel also intend to submit to the Court an analysis from a
7 corporate governance expert to provide further evidence of the value of the proposed
8 settlement for JAKKS and its shareholders and potentially experts on billing rates in
9 the relevant jurisdiction, and the allocation of partner time and associate time.
10 While Plaintiffs' counsel are prepared to provide the Court with this additional
11 information, counsel is unclear if this information should be provided prior to
12 Notice being sent or if it should be provided after Notice is sent and in connection
13 with the application for Final Approval.

14 If the Court wishes to review this information prior to Notice being sent, and
15 wishes to receive the submission from the corporate governance expert and other
16 experts in connection with consideration of preliminary approval of the request for
17 an award of attorneys' fees, then Plaintiffs' counsel request that they be allowed
18 until July 24, 2015 due to the time needed to obtain thorough and well-considered
19 experts' reports.

20 If, however, the Court only needs to consider, at this time, declarations from
21 counsel providing further specifics as to the tasks performed, then Plaintiffs' counsel
22 request that they be permitted until June 26, 2015 to file their additional
23 declarations. In the latter scenario, the submission from the corporate governance
24 and other experts will be submitted for the Court's consideration prior to Final
25 Approval.

26 In addition, Plaintiffs' counsel anticipates requesting, pursuant to Local Rule
27 79-5.1 and this Court's Order Re Pilot Program for Under Seal Documents, that they
28

1 be permitted to file certain information, such as attorney work-product which may
2 be submitted in support of the attorneys' fee requests, under seal.

3
4 DATED: June 15, 2015

LAW OFFICES OF DAVID N. LAKE

5
6 By: /s/
7 DAVID N. LAKE
Liaison Counsel for Plaintiffs

8 **CO-LEAD COUNSEL:**

9 Laurence D. Paskowitz, Esq.
10 **THE PASKOWITZ LAW FIRM P.C.**
208 East 51st Street, Suite 380
11 New York, New York 10022
12 212- 685-0969
212-685-2306 (fax)
13 classattorney@aol.com

14 --and--

15
16 Jeffrey C. Block, Esq.
Joel Fleming, Esq.
17 **BLOCK & LEVITON, LLP**
18 155 Federal Street
Boston, MA 02110
19 (617) 398-5600
20 jeff@blockesq.com
joel@blockesq.com
21

22 **OF COUNSEL:**

23 Roy L. Jacobs, Esq.
24 **ROY JACOBS & ASSOCIATES**
317 Madison Avenue 21st Floor
25 New York, NY 10017
26 212- 867-1156
212-504-8343 (Fax)
27 rjacobs@jacobsclasslaw.com

1 Richard A. Maniskas, Esq.
2 **RYAN & MANISKAS, LLP**
3 995 Old Eagle School Road, Suite 311
4 Wayne, PA 19087
5 484-588-5516
6 484-450-2582 (Fax)
7 rmaniskas@rmclasslaw.com
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28